

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

SINOVEL WIND GROUP CO., LTD.,
d/b/a SINOVEL WIND GROUP (USA),
CO., LTD.,

Defendant.

SEALED
SEALED
Case No. 12-MJ-11

COMPLAINT FOR VIOLATION OF TITLE 18,
UNITED STATES CODE, SECTIONS 1832 AND 2

BEFORE United States Magistrate Judge
Stephen L. Crocker

United States District Court
120 North Henry Street
Madison, Wisconsin 53703

The undersigned complainant being duly sworn states:

COUNT 1

On or about March 7, 2011, in the Western District of Wisconsin and
elsewhere, the defendant,

SINOVEL WIND GROUP CO., LTD.,
d/b/a SINOVEL WIND GROUP (USA), CO., LTD.,

by and through others, with the intent to convert a trade secret that is related to a
product that is used and intended for use in interstate and foreign commerce,
specifically, the source code development folder for the PM3000, which included source
code version 5650414_R1, the then most recent version of the PM3000 source code, to
the economic benefit of SINOVEL WIND GROUP CO., LTD., not the owner the trade
secret, and knowing and intending that the offense would injure the owner of the trade

secret, knowingly and without authorization copied, duplicated, downloaded, replicated, and conveyed such information.

(In violation of Title 18, United States Code, Sections 1832(a)(2) and 2).

This complaint is based on the attached affidavit of Special Agent Joshua Ben Mayers, Federal Bureau of Investigation, Madison, Wisconsin.



Joshua Ben Mayers
Federal Bureau of Investigation/SA

Sworn to before me this 6TH day of ~~May~~ ^{JUNE}, 2013



HONORABLE STEPHEN L. CROCKER
United States Magistrate Judge